

Thomas H. Bienert, Jr. (CA 135311, admitted *pro hac vice*)
Whitney Z. Bernstein (CA 304917, admitted *pro hac vice*)
BIENERT | KATZMAN PC
903 Calle Amanecer, Suite 350
San Clemente, California 92673
Telephone: (949) 369-3700
Facsimile: (949) 369-3701
tbienert@bienertkatzman.com
wbernstein@bienertkatzman.com
Attorneys for James Larkin

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,

Plaintiff,

vs.

Michael Lacey, *et al.*,

Defendants.

CASE NO. 2:18-cr-00422-SMB

**DEFENDANT JAMES LARKIN'S
NOTICE OF JOINDER IN
DEFENDANT BRUNST'S MOTION
TO DISMISS INDICTMENT BASED
ON FAILURE TO ALLEGE
NECESSARY ELEMENTS OF THE
TRAVEL ACT (Doc. No. 746)**

Defendant James Larkin, by and through undersigned counsel, joins in Defendant Brunst's Motion to Dismiss Indictment Based on Failure to Allege Necessary Elements of the Travel Act (Doc. No. 746). Defendant Larkin agrees with the statements made in Brunst's Motion to Dismiss and adopts the positions set forth in the Motion as if fully set forth herein.

Respectfully submitted,

DATED: September 30, 2019

BIENERT | KATZMAN PC

/s/ Whitney Z. Bernstein
Whitney Z. Bernstein
Thomas H. Bienert, Jr.
Attorneys for James Larkin

DEFENDANT JAMES LARKIN'S NOTICE OF JOINDER IN DEFENDANT BRUNST'S MOTION
TO DISMISS INDICTMENT BASED ON FAILURE TO ALLEGE NECESSARY ELEMENTS OF
THE TRAVEL ACT (Doc. No. 746)

CERTIFICATE OF SERVICE

I certify that on this 30th day of September, 2019, I electronically transmitted a PDF version of this document to the Clerk of the Court, using the CM/ECF System, for filing and for transmittal of a Notice of Electronic Filing to the following CM/ECF registrants listed below.

/s/ Toni Thomas

Toni Thomas

Anne Michelle Chapman, anne@mscclaw.com
 Erin E. McCampbell, emccampbell@lglaw.com
 Anthony R. Bisconti, tbisconti@bienertkatzman.com
 Ariel A. Neuman, aan@birdmarella.com
 Bruce S. Feder, bf@federlawpa.com
 James C. Grant, jimgrant@dwt.com
 Lee David Stein, lee@mscclaw.com
 Paul J. Cambria, pcambria@lglaw.com
 Robert Corn-Revere, bobcornever@dwt.com
 Ronald Gary London, ronnielondon@dwt.com
 Janey Henze Cook, janey@henzecoockmurphy.com
 John Lewis Littrell, jlittrell@bmkattorneys.com
 Seetha Ramachandran, Seetha.Ramachandran@srz.com
 Thomas H. Bienert, Jr. tbienert@bienertkatzman.com
 Whitney Z. Bernstein, wbernstein@bienertkatzman.com
 Gary S. Lincenberg, glincenberg@birdmarella.com
 Gopi K. Panchapakesan, gpanchapakesan@birdmarella.com
 Michael D. Kimerer, mdk@kimerer.com
 Rhonda Elaine Neff, rneff@kimerer.com
 David S. Eisenberg, david@deisenbergplc.com
 Joy Malby Bertrand, joyous@mailbag.com
 John Jacob Kucera, john.kucera@usdoj.gov
 Kevin M. Rapp, Kevin.Rapp@usdoj.com
 Margaret Wu Perlmeter, Margaret.perlmeter@usdoj.gov
 Reginald E. Jones, reginald.jones4@usdoj.gov
 Peter Shawn Kozinets, Peter.Kozinets@usdoj.gov
 Andrew C. Stone, andrew.stone@usdoj.gov
 Nanci Clarence, nclarence@clarencedyer.com
 Jonathan Baum, jbaum@clarencedyer.com